

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
Harrisonburg Division

## **CONSENT MOTION FOR PROTECTIVE ORDER**

Defendants Rachel Gaghan, Melody Eaton, and Linda Plitt-Donaldson, by counsel, pursuant to Rule 26(c), move for entry of a protective order and state as follows:

1. The parties anticipate the exchange and use of certain documents and other media in which the parties or other persons have a legitimate interest in keeping private and non-public, including personnel records.
2. A proposed Protective Order which has been approved by all counsel is attached hereto as **Exhibit A**. It is the belief of the parties that this proposed order complies with the Local Rule 9 respecting the filing of documents under seal.
3. The entry of this Protective Order will facilitate the discovery process and allow counsel and third parties to produce documents and media without having to seek the aid and protection of the Court in a piecemeal fashion.

WHEREFORE, Defendants respectfully request that this Court enter the attached Protective Order and afford the parties such other and further relief as this Court deems appropriate.

RACHEL GAGHAN,  
MELODY EATON,  
and  
LINDA PLITT-DONALDSON,

By Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2024, I have electronically filed this document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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